

AMOURA BRYAN 5 Boston Court Newark, N.J. 07103 amourabryan@gmail.com 929-216-9100

VIA PRO SE DESK

October 21, 2024

Honorable Eric Komitee United States District Court Eastern District of New York 225 Cadman Plaza East, Courtroom 6G North Brooklyn, New York 11201

> Re: Termination of Attorney Jo Saint-George Civil Action No: 22-cv-02234(EK)(LB)

Dear Judge Komitee:

I respectfully requested a conference or hearing to address and respond to Attorney Jo Saint-George's Motion to Withdraw as my counsel because her stated reasons are inaccurate and misrepresent the facts. Contrary to her claims, I have consistently communicated with Attorney Saint-George regarding the progression of my case. The allegations of non-communication with Attorney Saint-George are unfounded and false.

At this time I am informing you that I terminated Attorney Saint-George from my case and I do not want any further representation from her on this case.

To clarify my reasons for terminating Attorney Saint-George and to address the inaccuracies in her assessment of me, I outline the following points:

- 1. **Ongoing Communication:** I have maintained regular communication with Attorney Saint-George throughout my case. Therefore, the assertion that communication has been insufficient is false.
- 2. Inappropriate Conduct by Attorney Saint-George: Following your decision to dismiss the other plaintiffs' claims while allowing my claims to proceed, Attorney Saint-George has repeatedly contacted me urging me to agree to recuse you, Judge Komitee, and follow the same course of action as the dismissed plaintiffs. I told Attorney Saint-George that I will not agree to your recusal. She responded to that with a demand that I sign a waiver that is not in my best interest.

- 3. Misrepresentation and Lack of Consent: Attorney Saint-George's many attempts to force me into recusing you when I don't want to do that has severely damaged our attorney-client relationship. I have lost confidence in her ability to represent me fairly.
- 4. Threat of Retaining Lien and Financial Claims: Attorney Saint-George has threatened to place a retaining lien on my litigation file, despite my substantial financial contributions and other support to her practice. This is inconsistent with our original understanding that her services were provided under a nonprofit model aimed at supporting women of color. I have also worked to offset the cost of her services by referring similarly situated clients to her which contributed to the expansion of her client base.

Under New York's Rules of Professional Conduct, I have the right to discharge my attorney at any time. I am now in the process of retaining new legal representation or proceeding pro se. At this time, I do not want Attorney Saint-George to oppose the City's Motion for Reconsideration on my behalf, as I no longer have confidence in her ability to effectively represent my interests in this matter. Accordingly, I respectfully request the following:

- 1. An Extension of Time to Retain New Counsel: Pursuant to CPLR 321(b)(1), I request additional time to secure new legal representation in order to oppose the reconsideration of my case. I am requesting for the extended time period of 90 days.
- 2. Delivery of My Complete Case File: I further request that the Court order Attorney Saint-George to promptly send my complete case files, documents, and correspondence to me, in compliance with New York law. I request that these materials be delivered within 10 business days, either to my home address or via secure electronic delivery.
- 3. Pursuant to F.R.C.P. Rule 15: I request that I be given extended time and the opportunity to amend my complaint which is now only against two defendants, the City of New York and the Department of Education. I have issues that are pertinent to my specific case that I would like to submit to the court. These two defendants I feel necessitate an amended complaint to pursue my case.

I appreciate the Court's attention to this matter and its consideration of my requests.

Respectfully,

/s/ Amoura Bryan

Amoura Bryan

cc: Attorney Elisheva Leah Rosen (via email)

Attorney Jo Saint-George (via email and certified mail)